IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

SARAH MOLINA, et al.,		
Plaintiffs,)	Case No.: 4:17	7-cv-2498 AGF
v.)	Cuse Herri	
CITY OF ST. LOUIS, MISSOURI, et al.,		
Defendants.		

DECLARATION OF STEVEN HOFFMANN

I, Steven Hoffmann, declare as follows:

- I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called as a witness.
- 2. Twice in October 2014, on two different days, I was present in my capacity as a legal observer near profests in which people were expressing their opposition to police violence in the City of St. Louis.
- One of the protests was just north of the intersection of Vandeventer and Manchester/Chouteau Avenues.
 - 4. The other was just east of the intersection of Arsenal Street and Grand Avenue.
- I did not commit, or see any other protestor commit, any act of violence or pose any threat to any person or property.
- 6. On both occasions, I saw St. Louis Metropolitan Police Department officers deploy tear gas against people they perceived to be expressing an anti-law enforcement view in order to retaliate against them for that perceived view and chill them from publicly expressing it, including myself.

- 7. I saw SLMPD officers deploy tear gas against people who were unarmed, non-threatening, nonviolent, and not engaged in any crime.
- 8. At the Arsenal and Grand protest, I also saw officers deploy tear gas for the same reasons and against non-threatening people.
- 9. At the Vandeventer and Manchester/Chouteau protest, officers launched chemical munitions at me as I complied with their order to cross the street from the east sidewalk to the west sidewalk. They made this order despite the fact that I was across a parking lot from where officers were carrying out arrests and standing on a public sidewalk and was not committing any crime, causing any threat, or interfering with any police activities. They then punished me for obeying their order by subjecting me to tear gas.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this $\frac{1}{2}$ day of August, 2020

By: Steven Hoffmann